

ORIGINAL

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**FILED**  
DISTRICT COURT OF GUAM  
**MAR 12 2003**  
MARY L. M. MORAN  
CLERK OF COURT

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10 **IN THE UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF GUAM**

12 ALICE N. SALAS

13 Plaintiff,

14 vs.

15 JAMES JI ENTERPRISE,  
16 JJ PACIFIC DEVELOPMENT  
17 CORPORATION, JAMES JI,  
18 and HUANG LEE,

Defendants.

CIVIL CASE NO. 02-00002

**AFFIDAVIT OF PLAINTIFF  
REGARDING SETTLEMENT**

19 I, ALICE N. SALAS, do hereby declare and affirm:

- 20 1. I am the Plaintiff herein and therefore have personal knowledge of the facts stated  
21 herein;
- 22 2. I filed this case because I was denied my right to return to work after my jury  
23 service. I talked to Bennet Garcia who is a friend, and who also knows Mr. Lee  
24 and Mr. Ji, and asked her to help me when I got out of jury service and tried to go  
25 back to work.
- 26 3. After more than two weeks, I was finally told by Bennet Garcia that Mr. Lee said I  
27 could come back to work. When I went back, I was given an hour less each day as  
28 my schedule. I worked for about ten day and was treated like a stranger in the  
office. Mr. Lee treated me with such disrespect and made me feel so bad that I  
quit the job even though I really liked it.
4. I was so nervous and upset at my deposition. I had trouble breathing and had to  
go outside for awhile with my attorney. It was too much for me. I have a heart  
condition and my health is not so good since this case started. I am diagnosed  
with a heart murmur and enlarging heart. When I get stressed, it is hard to breathe  
and I have a lot of trouble with pain and so forth.

- 1 5. My lawyer has tried to settle the case and I thought that \$12,000 was reasonable  
2 when she was negotiating with Mr. Lee. At one time, Mr. Lee made me an offer  
3 but wanted to give me a promissory note and I needed cash money.
- 4 6. The case has taken so long that I am in debt and cannot go to the doctor. The  
5 longer it takes, the more I get stressed.
- 6 7. My lawyer told me Mr. Ji came on island and wanted to talk to me before his  
7 deposition, so I agreed to meet with him in my lawyer's office. The deposition  
8 was in February, 2003.
- 9 8. At the meeting with Mr. Ji, he told me he had \$1,000 and would give me \$6,000  
10 cash to drop everything that day. I told him I had to discuss it with my family and  
11 my lawyer. He said if the case went to trial we have to go to the Ninth Circuit and  
12 it would take so long.
- 13 9. Mr. Ji told me he did not know Mr. Lee was going to "do that to me." He said  
14 that many people had told him about Mr. Lee having so many secretaries and  
15 keeping employees only a short time. He said Mr. Lee is his nephew.
- 16 10. After I talked to Mr. Ji, I was upset and left to go talk to my family. My lawyer  
17 told me she would negotiate with them some more. She told me that Mr. Ji has  
18 said he might hire me to work for him. I did not want to do that because of the  
19 stress.
- 20 11. My lawyer told me that she had made an offer and was waiting for an answer from  
21 Mr. Ji. I don't remember the amount she said but I thought \$10,000 was  
22 reasonable for what I had lost by not working for over a year and the emotional  
23 suffering I have gone through just having a legal case.
- 24 12. On Thursday, I called Bennet Garcia. I know that she talks to Mr. Ji often. I  
25 asked her to talk to him and find out if he could just pay me and I would drop the  
26 case. I told Bennet that Mr. Ji offered me \$6,000 and the case was taking so long,  
27 my finances are so bad, I would take "anything." I just want the case to be over  
and get on with my life. I also need money to go to the doctor because I am  
having trouble sleeping and cannot afford doctor's bills. I even have to have  
glasses and cannot afford them. And, my creditors are calling me all the time and I  
don't know what else to do.
13. I told Bennet that I had told my lawyer I want to settle and that she is working on  
it, but if Bennet could call Mr. Ji he might settle. Bennet called me back after a  
few hours and said he agreed to settle with me for \$6,000.
14. Bennet told me Mr. Ji offered part cash and part checks, but I did not want to have  
a large check, so Bennet offered to have the checks written in her name and she  
would cash them for me and drop the money to me, which she did.
15. I wrote out a receipt and gave to Bennet to give to Mr. Ji because I did not want  
to talk to him. I am too nervous and just relied on Bennet to help me out. She  
gave me all the money and gave the receipt and my note to Mr. Ji so I could drop  
the case. He only wanted a receipt so I wrote "case dropped."

1 16. I am sorry that I did not have my lawyer do the settlement, but I needed money  
2 and Bennet said she would help.

3 17. When I was working for Mr. Ji, I did not have so many medical problems and not  
4 so many bills. That is why I needed to settle the case, and it was taking so long. I  
5 was so nervous after my deposition that I did not want to go into court and have  
6 to say those things again, especially because it is so upsetting to talk about. I just  
7 want the case to be over and get back to my life.

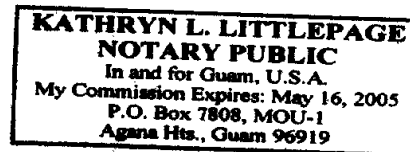
8 I make these statements under penalty of perjury this 11<sup>th</sup> day of March, 2003.

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10  
11 *Alice N. Salas*

12 ALICE N. SALAS

13 SUBSCRIBED & SWORN to before me this 11<sup>th</sup> day of March, 2003 by Alice  
14 N. Salas

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17 *Kathryn L. Littlepage*  
18 Notary Public



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28 Alice N. Salas v. James Ji Enterprises, et al.  
Civil Case No. 02-00002  
Affidavit of Plaintiff Regarding Settlement